



U.S. Department of Justice

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March 5, 2025

VIA EMAIL

Jonathan P. Farmer
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Re: Disclosures in the matter of United States v. Casada, et al.
Case No. 3:22-cr-00282 (U.S.D.C. M.D. Tenn.)

Dear Mr. Farmer:

I write in response to your letter of February 20, 2025, and in follow up to the February 28, 2025 call with your colleagues, Ed Yarbrough and Chase Fann, and counsel for Mr. Cothren.

At the beginning of the February 28, 2025 call, I explained our interest in providing you the materials to which you are entitled, and our appreciation that your letter identified some specific areas in which you believe the government's production was deficient (namely, materials related to the government's *ex parte* motion dated September 24, 2024, and contacts by Mr. Sexton with the FBI in 2019). I then asked your colleagues if there were any other specific areas as to which they believed the government's production was deficient – particularly regarding your statement that you have "information that Cameron Sexton and/or Connie Ridley have violated and perhaps continue to violate, state and federal criminal and election law."

In response, Mr. Yarbrough asked when the defense would receive a production in response to Judge Richardson's December 19, 2024 Sealed Order (the "Sealed Order"). When I asked whether he would respond to my question regarding other specific areas of deficiency, he replied, "No."

The parties then engaged in some discussion of the Sealed Order, during which Mr. Yarbrough quoted the following language from the Sealed Order:



[REDACTED] As I stated on the call, we do not believe any portion of the Sealed Order required the government to produce any documents. To the extent you disagree, please identify the language from the Sealed Order which you believe does so.

Mr. Yarbrough also asked if the line prosecutors would object if he appealed our discovery decisions to the Department of Justice. As I said on the call, I am glad to provide your letter to my supervisor if you so request.

I concluded the call by again expressing my appreciation that your letter identified some specific areas in which you believe the government's discovery productions may be deficient.

In sum, the government will continue to abide by its discovery obligations, and we invite further dialogue if you believe there are specific areas in which our productions are deficient.

Sincerely,

ROBERT E. McGUIRE
Acting United States Attorney
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By: /s/ Taylor J. Phillips
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cc: Edward M. Yarbrough
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